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Counsel for Defendant Mark Christopher RAMSEY

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	CASE NO. CR 13-00286 SI
)	
Plaintiff,)	STIPULATION REQUESTING
)	CONTINUANCE OF CHANGE OF PLEA
v.)	HEARING; EXCLUSION OF TIME;
)	PROPOSED ORDER
MARK CHRISTOPHER RAMSEY,)	
)	Current Date: October 11, 2013
Defendant.)	Proposed Date: October 25, 2013
)	Time/Place: 11:00 a.m./Ctrm. 10

The defendant, MARK CHRISTOPHER RAMSEY, represented by Assistant Federal Public Defender Brandon LeBlanc, respectfully requests that the Court continue the change of plea hearing currently set for October 11, 2013, at 11:00 a.m., until **October 25, 2013, at 11:00 a.m.**, or any later date convenient for the Court, due to the unavailability of counsel for both parties.

The parties further stipulate that time has and continues to be properly excluded under the Speedy Trial Act for effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv).

Respectfully submitted,

/s/
BRANDON M. LeBLANC
Assistant Federal Public Defender

Dated: September 24, 2013

1 IT IS SO STIPULATED.

2 Dated: September 24, 2013

/s
KATIE MEDEARIS
Assistant United States Attorney

6 **[PROPOSED] ORDER**

7 Based upon the representations of counsel and for good cause shown, the Court continues
8 the change of plea hearing from October 11, 2013, at 11:00 a.m. until ~~October 25, 2013, at~~
9 **11:00 a.m.**, before this Court.

10 The Court finds that failing to exclude the time between October 11, 2013, and
11 October 25, 2013, would unreasonably deny the defendant reasonable time necessary for
12 effective preparation, taking into account the exercise of due diligence. 18 U.S.C.
13 § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time
14 between October 11, 2013, and October 25, 2013, from computation under the Speedy Trial Act
15 outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS
16 HEREBY ORDERED that the time between October 11, 2013, and October 25, 2013, shall be
17 excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

18 IT IS SO ORDERED.

19 Dated: 9/24/13



SUSAN ILLSTON
United States District Judge